

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALEXANDRA AVCHUKOV, QUENTIN  
CHAPPAT, SANDRA MAESTRA PEREIRA,  
KRIS IYER, ANTHONY PALIE, DAKOTA  
BEDELL, CARL CORBO, ANNABEL  
GOULD, DOLORES THOMPSON,  
BRIDGETTE WINKELMANN, BILLY TING,  
DUOC VO, GARRY HUANG, JEFFREY  
HANG, JOSHUA CHIN, and WILLY NGO, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

- against -

AVANT GARDNER, LLC, EZ FESTIVALS,  
LLC, MADE EVENT, LLC and JURGEN  
BILDSTEIN,

Defendants.

Civil Action No. 1:23-cv-08106-MMG

**NOTICE OF DEFENDANTS' MOTION TO  
DISMISS CERTAIN DEFENDANTS AND  
COUNTS OF THE AVCHUKOV  
COMPLAINT**

**(Oral Argument Requested)**

**PLEASE TAKE NOTICE** that, upon the Memorandum of Law in Support of Defendants' Motion to Dismiss Certain Defendants and Counts of the Avchukov Complaint, dated March 21, 2024, and upon all the pleadings and proceedings herein, Defendants AVANT GARDNER, LLC, EZ FESTIVALS, LLC, MADE EVENT, LLC and JURGEN BILDSTEIN will move this Court, before the Honorable Margeret M. Garnett, U.S.D.J., at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, New York, 10007, on a date and time to be determined by the Court, for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing Defendants AVANT GARDNER, LLC and JURGEN BILDSTEIN, as well as Counts 3, 5, 6, 7, and 8 of the Avchukov Plaintiffs' Consolidated Class Action Complaint, in their entirety with prejudice, on the grounds that Plaintiffs fail to state a claim upon which relief can be granted, and for such other relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that Defendants respectfully request oral argument with respect to this motion.

Dated: March 21, 2024  
New York, New York

Respectfully submitted,

KAUFMAN DOLOWICH, LLP

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and JURGEN BILDSTEIN